

EXHIBIT B

From: [Shannon Coit](#)
To: [Hari, Rahul \(USACAC\)](#); [Thakor, Neil \(USACAC\)](#)
Cc: [Ryan Shelley](#)
Subject: RE: U.S. v Zaitsev
Date: Saturday, April 5, 2025 9:19:00 AM

Rahul and Neil,

I am hearing that ICE officers are speaking to Mr. Zaitsev in an interrogation-like setting (multiple officers at once in a small room) and requesting that he sign a document relating to deportation. As you both know, Ryan and I continue to represent Mr. Zaitsev in his criminal matter. Government agents, including ICE officers, should not be questioning/speaking to Mr. Zaitsev about anything that could impact his criminal case, including his status and the legality of him being in the U.S., which may be part of his defense as previously discussed at the Court hearings and meet-and-confers, without us present. He has previously invoked his 5th Amendment rights and, of course, is now represented. The officers also should not be presenting him anything to sign without our review so we can determine how it impacts his criminal case. Please communicate this to the necessary individuals so this does not happen again.

Further, I am doubtful this is true, but there may have been some discussion about deporting Mr. Zaitsev prior to his criminal trial and immigration hearing. I doubt this is true because I did not see a deportation order in his A file. It is my understanding that he cannot be deported without one and an immigration court would not order one until his merits hearing in July. If you have any information about ICE/DHS trying to deport Mr. Zaitsev prior to his criminal trial (or have further information on this topic), please let us know.

As always, we're free to discuss any of the above. I'm at 213-894-4748.

Best,
Shannon

From: Shannon Coit <Shannon_Coit@fd.org>
Sent: Friday, April 4, 2025 7:54 PM
To: Hari, Rahul (USACAC) <Rahul.Hari@usdoj.gov>; Thakor, Neil (USACAC) <Neil.Thakor@usdoj.gov>
Cc: Ryan Shelley <Ryan_Shelley@fd.org>
Subject: Re: U.S. v Zaitsev

Thank you for the update. Also please let us know if there is an update on visiting the ICE offices on Monday. Otherwise, we're free 3:30 or after for the call.

Best,
Shannon

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From: Hari, Rahul (USACAC) <Rahul.Hari@usdoj.gov>
Sent: Friday, April 4, 2025 7:41:56 PM
To: Shannon Coit <Shannon_Coit@fd.org>; Thakor, Neil (USACAC) <Neil.Thakor@usdoj.gov>
Cc: Ryan Shelley <Ryan_Shelley@fd.org>
Subject: Re: U.S. v Zaitsev

Hi Shannon,

To follow-up on our call: it is my understanding that Mr. Zaitsev is at Desert View Annex in Adelanto.

We have communicated the need to preserve Mr. Zaitsev's clothing and will follow-up next week.

We will be prepared to discuss the other items you've outlined below on Monday.

Best,
Rahul

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From: Shannon Coit <Shannon_Coit@fd.org>
Sent: Friday, April 4, 2025 6:39 PM
To: Hari, Rahul (USACAC) <Rahul.Hari@usdoj.gov>; Thakor, Neil (USACAC) <Neil.Thakor@usdoj.gov>
Cc: Ryan Shelley <Ryan_Shelley@fd.org>
Subject: [EXTERNAL] RE: U.S. v Zaitsev

Rahul and Neil,

Following up on our conversations, you stated that the government has informed ICE to preserve Mr. Zaitsev's clothing and make it accessible for our review (it will later be determined whether that is through you or them). However, the government does not know where Mr. Zaitsev is being detained by ICE but you will inform us as soon as you know. As of now, we cannot meet with him in person, speak with him on the phone, nor contact him via email, and we will be unable to have any of those communications with him until you inform us where he is.

We request a meet and confer on Monday so we can discuss the logistics of pursuing this case with

Mr. Zaitsev in ICE custody. Please be prepared to discuss how Mr. Zaitsev will be transferred for court appearances, how we will be able to meet with him while in ICE custody, how we will have unrecorded phone and/or video calls with him while in ICE custody, and similar topics. We also expect an update on where he is being detained.

Best,
Shannon

From: Shannon Coit
Sent: Friday, April 4, 2025 4:25 PM
To: Hari, Rahul (USACAC) <Rahul.Hari@usdoj.gov>; Thakor, Neil (USACAC) <Neil.Thakor@usdoj.gov>
Cc: Ryan Shelley <Ryan_Shelley@fd.org>
Subject: RE: U.S. v Zaitsev

Rahul and Neil,

The Marshals just informed me that ICE did pick up Mr. Zaitsev. Our request to have his clothes from that day preserved remains. Please contact ICE to ensure this request is honored.

You can call me at 213-894-4748 with any questions.

Thank you,
Shannon

From: Hari, Rahul (USACAC) <Rahul.Hari@usdoj.gov>
Sent: Wednesday, April 2, 2025 1:57 PM
To: Shannon Coit <Shannon_Coit@fd.org>; Thakor, Neil (USACAC) <Neil.Thakor@usdoj.gov>
Cc: Ryan Shelley <Ryan_Shelley@fd.org>
Subject: RE: U.S. v Zaitsev

Shannon and Ryan,

As discussed on our call:

1. We will reach out to marshals and BOP to ensure Mr. Zaitsev's clothing is preserved,
2. Please provide us with a schedule on when you are available to view the ICE offices,
3. Please provide us with information on when Mr. Zaitsev or someone else will be available to pick-up Mr. Zaitsev's ID and social security card,
4. We will re-produce USAO 118-119 (witness statements) with the protective order stamp removed, and
5. We can coordinate later this week regarding an internal draft exchange schedule for our joint pre-trial filings.

Thanks, and talk soon,

Rahul

Rahul R.A. Hari | Assistant United States Attorney

General Crimes Section | Central District of California

Office: (213) 894-6159 | Mobile: (213) 248-7792 | Rahul.Hari@usdoj.gov

From: Shannon Coit <Shannon_Coit@fd.org>

Sent: Wednesday, April 2, 2025 12:08 PM

To: Hari, Rahul (USACAC) <Rahul.Hari@usdoj.gov>; Thakor, Neil (USACAC) <Neil.Thakor@usdoj.gov>

Cc: Ryan Shelley <Ryan_Shelley@fd.org>

Subject: [EXTERNAL] U.S. v Zaitsev

Rahul and Neil,

I am reaching out with some additional discovery-related matters.

1. We request that the government ensure that the clothing that Mr. Zaitsev was wearing on February 25, 2025 at the time of the incident is preserved and made available for inspection.
- 2.
3. We would like to arrange a site visit for the ICE offices within the next week.

Please let us know if you have any questions or would like to discuss.

Best,
Shannon

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